Remarks:

This is in response to the Notice mailed on June 17, 2004 indicating that the applicant's amendment of April 5, 2004 was non-responsive. This response is timely filed on Monday, July 19, 2004, the first business day following July 17, 2004. This amendment returns to the previously elected invention and reinstates prior claim 23 as new claim 28. Reexamination and favorable consideration are requested.

Applicant cancels the previously pending claims and adds new claims 28-31. Claim 28 relates at least to the embodiments of the invention discussed at paragraphs 216-233. As discussed there, a non-volatile memory is divided into a plurality of zones. The address translation table for the memory is prepared so that it includes less than all of the zones in the memory. This allows the address translation table to be smaller than would be required to include translation information for the complete memory. Of course, that means that there are portions of the memory that are not described by the address translation table. When there is a memory request for a logical block address not within the zone or zones described in the address translation table, a new address translation table is prepared that includes the zone information for the requested logical memory block.

This is reflected in the present claim 28, which recites:

"preparing, in response to a power supply being turned on, a prepared address translation table comprising address translation information between logical blocks and physical blocks within the memory array, the prepared address translation table including address translation information for logical block addresses within at least the first zone and not including address translation information for logical block addresses within at least the second zone; and

determining that a requested logical block is not within the prepared address translation table and subsequently preparing a second address translation table comprising address translation information for logical block addresses within the second zone."

None of the references of record to this application describes a memory system that prepares an address translation table that covers less than the entire non-volatile memory array or that determines when a memory request does not correspond to the address translation table and that subsequently prepares a second, appropriate address translation table.

4

Consequently, claim 28 and its dependent claim 29 distinguish over the art of record and is in condition for allowance.

Independent claim 30 similarly recites:

"storing in a random access memory in the system a first table for managing corresponding relationships between a first set of the logical blocks and the physical blocks of a first physical block zone including one or more of the physical blocks; and

determining in response to an access from a host that a requested logical block is not within the first table and subsequently storing in the random access memory a second table comprising relationships between a second set of the logical blocks and the physical blocks of a second physical block zone including one or more of the physical blocks."

For the reasons discussed above, claim 30 and its dependent claim 31 distinguish over the art of record and is in condition for allowance.
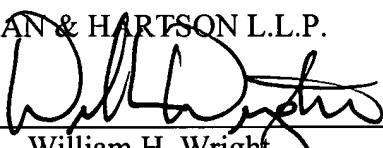
In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (213) 337-6700 to discuss the steps necessary for placing the application in condition for allowance.

If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1314.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

Date: July 19, 2004   By:_____

William H. Wright
Registration No. 36,312
Attorney for Applicant(s)

500 South Grand Avenue, Suite 1900
Los Angeles, California 90071
Phone: 213-337-6700
Fax: 213-337-6701